

# Information Bulletin

## Failure to Change Facility Modes Results in Technical Safety Requirement Noncompliance

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**Summary:** Understanding of Technical Safety Requirements (TSRs) and TSR bases is critical to adequate compliance. Personnel responsible for implementing TSR requirements should understand not only the text of the requirement, but also the basis for the requirement.

**Discussion of Activities:** On Monday, March 26, 2007 the T Plant Canyon was placed in Operation Mode. In addition to workers being assigned to compact empty waste drums, several other operational and maintenance activities were released for that day. These included movement of materials into the Canyon to support compactor operations, and an annual preventive maintenance for the Tunnel Roll-Up Door. Due to canyon air flow characteristics, the Head End access doors and the Tunnel Roll-Up Door are not opened at the same time. Work was coordinated to complete material movements, shut the associated Head End access doors, and then commence maintenance work on the Tunnel Roll-Up Door.

At approximately 0930, the movement of support materials into the canyon through the Head End was completed and the Maintenance Supervisor was notified that work could begin on the Tunnel Roll-Up Door. At approximately 0940, compactor activities began in the Canyon and continued until 1030. At 1040 hrs, the Duty Operations Supervisor (DOS) contacted the Operations Manager to determine if the Tunnel Roll-Up Door could remain in the open position during the lunch period pending completion of the annual inspection. The Operations Manager questioned the Mode of Operation for the Canyon and the error was recognized.

**Analysis:** The TSR allows the roll-up door to be open while in Operation Mode as required to support operational activities (e.g. movement of waste drums, materials and equipment). However, the facility must be placed in a Standby Mode for maintenance activities. The basis for the TSR is that opening certain doors can cause the Canyon to lose differential pressure (dP). However, the TSR does not specifically document the expectation for implementation (i.e., definition of operational activity, frequency/duration of loss of dP). The analysis identified that the wording in the associated work package and operations procedure were not crisp and required the supervisor to interpret the requirement. In this situation, without a high level of understanding, the potential to make an error in judgment is increased.

Training personnel at higher cognitive levels (i.e., analysis and synthesis) can develop the appropriate knowledge base to increase compliance.

**Recommended Actions:** Facilities should consider performing a training needs analysis and a continuing training plan to refresh personnel on the intent and technical basis for the TSRs and Limiting conditions for Operations.

**Cost Savings/Avoidance:** Not determined

**Work Function:** Authorization Basis

**Hazards:** Personal Injury/Exposure Airborne Materials

**ISM Core Functions:** Perform Work

**Keywords:** Technical Safety Requirement, TSR,

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**References:** Occurrence Report EM-RL--PHMC-TPLANT-2007-0002, Violation of Technical Safety Requirement